

### REMARKS

The claims have been amended as indicated above. The amendments are being made to clarify the scope of the invention and to focus the claims on those aspects of the invention that are of a commercial priority to the assignee. The amendments are fully supported by the specification, claims, and figures as originally filed. No new matter is believed or intended to be involved.

The Office Action dated 07/21/2005 notes that IDS elements have been crossed out as “not available to consider.” Re-submission of those IDS elements was requested for consideration. Accordingly, copies those IDS elements, in addition to other IDS references, are being submitted herewith.

Claims 1-39 were rejected under 35 U.S.C. § 103(a) as being obvious over Rofrano (U.S. Patent 6,035,283) in view of Reisman (U.S. Patent 6,658,464). Under MPEP 2143.03, in order to establish a *prima facie* case of obviousness, the prior art reference or combination of references must teach or suggest all of the limitations of a claim. A *prima facie* case of obviousness also requires that there be some teaching, suggestion, or motivation to modify the references either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. MPEP 2143.01. The mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination.

Applicants note that the art of record fails to teach or suggest all of the limitations recited in each independent claim, particularly in the arrangement required by each of the independent claims. Thus, a case of obviousness in accordance with MPEP 2143.03 cannot be established. For instance, with respect to present independent Claim 1, Applicants note that the claim recites the encoding of an embedded navigation link so that it appears to be associated with a second domain, when in fact the encoded embedded navigation link continues to be actually associated with a first domain. The first and second domains are remote relative to the user. Applicants submit that these limitations are neither taught nor suggested by the combined art of record. For

instance, Rofrano teaches nothing about modifying links or the appearance of links. Reisman teaches the modification of links in a manner that is different from that recited in Claim 1. In particular, Reisman teaches the conversion of links to point to local locations on a user's system so that the user can view web content offline. The treatment of links recited in Claim 1 differs in that the recited link continues to be associated with the first domain, despite having the *appearance* of being associated with the second domain. In addition, Claim 1 recites the modification of links relative to remote domains, whereas Reisman teaches the modification of links relative to a remote location and a local location. (See, e.g., Reisman at Col. 36, l. 60 through Col. 37, l. 13; Col. 41, l. 1 through Col. 43, l. 11). The combined art of record thus fails to render present Claim 1 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent Claim 13 recites an annotation server that is configured to encode a first or second content portion to create an appearance to the user as if both content portions originate from a common domain that is remote relative to the user. The first and second content portions continue to originate from respective first and second domains, which are each remote relative to the user, despite the artificial appearance that they originate from a common domain. Thus, for at least the same reasons that the combined art of record fails to teach every limitation recited in Claim 1, the art of record fails to teach every limitation recited in Claim 13. Accordingly, the combined art of record fails to render present Claim 13 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent Claim 20 also recites the encoding of a link to create the appearance that the link is associated with a second domain that is remote relative to the user, when in fact the link is actually associated with a first domain that is remote relative to the user. Thus, for at least the same reasons that the combined art of record fails to teach every limitation recited in Claim 1, the combined art of record fails to teach every limitation recited in Claim 20. Accordingly, the art of record fails to render present Claim 20 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

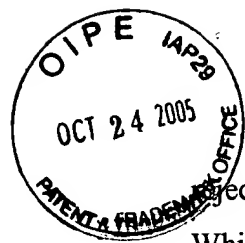
Similarly, amended independent Claim 25 recites the encoding of a link to create an appearance that the link is associated with a second domain that is remote relative to the user; while the encoded link continues to actually point to a location in the first domain despite the encoding. Thus, for at least the same reasons that the combined art of record fails to teach every limitation recited in Claim 1, the combined art of record fails to teach every limitation recited in Claim 25. Accordingly, the art of record fails to render present Claim 25 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Amended independent claims 30 and 36 each recite a data collection module that records data related to an actual end-user support session and that further provides an update to a knowledge database relating to the actual end-user support session. Applicants submit that these limitations are neither taught nor suggested by the combined art of record. Accordingly, the art of record fails to render present Claims 30 and 36 obvious in accordance with MPEP 2143.03, and the rejection should therefore be withdrawn.

Even if all of the references in combination taught or suggested all of the limitations recited in the amended claims, the Examiner has failed to establish the motivation to modify or combine the teachings of the references as required by MPEP 2143. Accordingly, even if the references in combination taught or suggested all of the limitations recited in each of the amended claims (which they do not), a *prima facie* case of obviousness has not been and cannot be established because the Examiner has failed to establish a suggestion or motivation to modify or combine the teachings of the references. In light of the foregoing, and in view of MPEP 2143.01, all of the presently amended claims are patentable over the art of record, and Applicants respectfully request that the rejections be withdrawn.

Beyond the foregoing shortcomings with respect to the independent claims, Applicants further note that the dependent claims include additional limitations not taught or suggested in the art of record, thus forming independent basis for novelty and non-obviousness.

To the extent that the present amendments constitute a narrowing of the claims, such narrowing of the claims should not be construed as an admission as to the merits of the prior



09/944,836

rejections. Indeed, Applicants traverse the rejections and preserve all rights and arguments. While Applicants have noted several distinctions over the art of record, Applicants note that several other distinctions exist, and Applicants preserve all rights and arguments with respect to such distinctions.

Based on the foregoing, all pending claims are in a condition for allowance. Accordingly, Applicants submit that all pending claims overcome the rejections presented in the Office Action, and respectfully request reconsideration and a notice of allowance.

Respectfully Submitted,

Andrew B. Ulmer (Reg. No. 57,003)  
FROST BROWN TODD LLC  
2500 PNC Center  
201 East Fifth Street  
Cincinnati, Ohio 45202-4182  
513-369-4811 (direct)  
513-651-6981 (fax)

**Certificate of Mailing**

The undersigned certifies that this correspondence was deposited with the U.S. Postal Service with sufficient postage as first class mail and addressed to "Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450" on this 21<sup>st</sup> day of October, 2005.